



December 6, 2024

VIA ECF

Honorable Jessica G. L. Clarke
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

Re: *DRC LV Ventures, LLC v. Dalpour*, 23 Civ. 7827 (JGLC)

Dear Judge Clarke:

Pursuant to the Court's November 18, 2024 Order, we write jointly with the consent of Defendants to provide the Court with a status update. We have two developments to report.

First, with respect to the Protective Order (Dkt. No. 35), the parties have agreed to modify the existing order to change the deadline to return or destroy confidential documents until any judgment resolving this case is satisfied. We are attaching a revised proposed order at Exhibit A that incorporates the following revisions to Paragraph 17 of the original order:

This Protective Order shall survive the termination of the litigation. Within 30 days of the full satisfaction of any monetary judgment entered in this action, or within 30 days of the final disposition of this action, whichever is later, all Confidential Discovery Material and all copies thereof, shall be promptly returned to the producing person, or, upon permission of the producing person, destroyed.

Second, after the Revised Protective Order is entered, Plaintiffs intend to file a stipulated judgment that Defendants agreed to previously.

With the consent of Defendants, Plaintiffs respectfully request that the Court enter the Revised Protective Order (Exhibit A). The parties further respectfully request that the Court set a conference for roughly 30 days from today to address any issues that remain if a judgment has not been entered in the interim.

BSF

Respectfully Submitted,

/s/ Peter Skinner

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